

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUMBERTO A. REYES-RODRIGUEZ
a/k/a Tony Reyes,
ALEXIS IKILIKYAN,
a/k/a Haikanush Ikilikyan,
WILLIAM S. POFF,
MICKI S. THOMPSON, and
MARIO A. MARROQUIN,

Defendants.

NO. CR09-0160JLR

FIRST BILL OF PARTICULARS RE:
FORFEITURE

The United States of America, by and through Jeffrey C. Sullivan, United States Attorney for the Western District of Washington, and Sarah Vogel, Assistant United States Attorney for said District and Darwin P. Roberts, Assistant United States Attorney for said District, hereby files the following bill of particulars.

The Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c), upon conviction of the offense charged in Count 1 (Conspiracy to Commit Bank and Wire Fraud) and Count 2 (Conspiracy to Engage in Money Laundering) of the Indictment, in violation of Title 18, United States Code, Section 1349 and Title 18, United States Code, Section 1956(h).

The United States hereby gives notice that it seeks forfeiture of the property listed and described in the Criminal Forfeiture Notice section of the Indictment, including, but not limited to, the following assets:

1. \$2,031.14, more or less, in U.S. currency, seized from Mario A. Marroquin;
2. \$2,305.00, more or less, in U.S. currency, seized from Armenuhi Harutyunyan;
3. 1 (one) FN 590 5.7x28mm pistol;
4. 1 (one) Colt .45 Caliber M1991A1 pistol and magazine;
5. 1 (one) Uzi 9mm pistol;
6. 1 (one) Mark III 303B rifle and magazine;
7. 1 (one) AK47 7.62mm rifle and magazine;
8. 1 (one) Beretta 9mm pistol and 2 magazines;
9. 1 (one) Uzi Model A 9mm Rifle and magazine;
10. 1 (one) Kimber Ultra CDP2, .45 Caliber Pistol and magazine;
11. 1 (one) RPB .345 caliber MAC-10 Pistol and magazine;
12. 1 (one) Bushmaster AR15 .223 Rifle;
13. 1 (one) Charter Arms, .38 caliber Pistol;
14. 1 (one) HK Sp89 Pistol and 2 magazines;
15. 1 (one) HK 94, 9mm Rifle and 3 magazines;
16. 1 (one) Franchi Spas-12 Shotgun;
17. 3 (three) each .223/5.56mm magazines;
18. 653 (six hundred fifty-three) each 9mm Luger bullets;
19. 40 (forty) each .223 caliber Winchester bullets;
20. 61 (sixty-one) each .45 caliber Remington bullets; and
21. 4 (four) each 12-gauge shotgun shells.

1 DATED this 19th day of August, 2009.

2 Respectfully submitted,

3 JEFFREY C. SULLIVAN
4 United States Attorney

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6 s/Darwin P. Roberts
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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2009, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). I hereby certify that I have served the attorney(s) of record for the defendant(s) that are non CM/ECF participants via telefax.

s/Gina Santopolo
Gina Santopolo
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